

EPA COMMON SENSE INITIATIVE METAL FINISHING STRATEGIC GOALS PROGRAM INDIANA IMPLEMENTATION PLAN FOR 1999 - 2000

I. INTRODUCTION

Indiana is one (1) of sixteen (16) states participating in the national metal finishing industry and USEPA Common Sense Initiative Metal Finishing Strategic Goals Program (SGP). The SGP is designed to promote cleaner, cheaper and smarter environmental protection by the metal finishing industry and establishes a set of voluntary performance goals with target dates of 2002. These facility-based goals represent “better than compliance” environmental performance allowing the metal finishing industry to substantially reduce pollution from their operations. The Goals Program is aiming for 100% compliance across the industry, and having 80% of firms reach the facility-specific targets. Background information regarding the SGP is included in Attachment A.

As of June 21, 1999, a total of ten (10) Indiana metal finishing facilities and three (3) publically owned treatment works (POTWs) have signed on to the Goals Program. A listing of these participating facilities/POTWs is provided in Attachment B. By signing on to the Goals Program, these metal finishing facilities have voluntarily committed to making a good faith effort toward achieving the National Performance Goals outlined below.

II. METAL FINISHING NATIONAL PERFORMANCE GOALS

FACILITY-BASED GOALS (1-3)

Goal 1: Improved Resource Utilization

- ✓ 98% of metals ultimately utilized.
- ✓ 50% reduction in water purchased and used.
- ✓ 25% reduction in facility-wide energy use.

Goal 2: Reduced Hazardous Emissions and Exposures

- ✓ 90% reduction in organic TRI chemicals and a 50% reduction in metals, emitted to air and water.
- ✓ 50% reduction in land disposal of hazardous sludges and a reduction in the generation of sludges.
- ✓ Reduction in human exposure to toxic materials in the facility and the surrounding community.

Goal 3: Increased Economic Pay backs and Decreased Compliance Costs

- ✓ Long-term economic benefit to facilities achieving Goals 1 and 2.
- ✓ 50% reduction in costs of unnecessary permitting, reporting, monitoring, and related activities (from 1992 levels).

INDUSTRY-WIDE GOALS (4 and 5)

Goal 4: Industry-Wide Achievement of Goals Relating to Individual Facilities

Goal 5: Industry-Wide Compliance with Environmental Performance Requirements

- ✓ All operating facilities achieve compliance with Federal, state, and local environmental performance requirements.
- ✓ All metal finishers that wish to cease operations have access to a government sponsored “exit strategy” for environmentally responsible site transition.
- ✓ All enforcement activities are conducted in a consistent manner to achieve a level playing field.

III. INDIANA IMPLEMENTATION PLAN AND SCHEDULE

Based on a series of stakeholder meetings held on November 19, 1998; March 31, 1999 and May 27, 1999; the following implementation plan for 1999 to 2000 has been proposed:

METAL FINISHER RESPONSIBILITIES:

Action Item	Due Date	Person(s) Responsible	Note(s)
1. Consider IDEM guidance re: treatment of hazardous waste on-site by generators	Summer 1999	Mark Sutton/H.H. SUMCO and Gary Romesser/IDEM-RCRA	
2. Prepare requests for variances from classification as a solid waste in accordance with 40 CFR 260.30 and 40 CFR 260.31.	1999	Interested companies in cooperation with Gary Romesser/IDEM.	
3. Document and explore options for segregating wastestreams/sludges in order to reduce volume of sludges ultimately regulated as hazardous waste and/or F006.	Early fall 1999	Kevin Frecker/Baycote Metal Finishing to document their experiences & provide to CMTI. Other companies urged to share their experiences as well.	
4. Recruit more metal finishers to officially sign on to SGP.	1999 - 2000	Jerry Phillips, on behalf of AESF, in cooperation with Shayla Barrett/CMTI and Robert McDowell/ SFIC	
5. Pursue assessments/audits in order to benchmark individual metal finisher's current status for: - energy usage, emissions, and wastes - capital improvement opportunities - compliance status	1999	All SGP metal finishers in cooperation with CMTI and IDEM/OPPTA	Consider IDEM's <i>Self-disclosure and Environmental Audit Policy</i> as published in 5/1/99 <u>Indiana Register</u> (Attachment C).

6. Pursue pilot project with Strategic Development Fund as a “manufacturing network” and use any grant monies awarded to pursue specific SGP facility-based goals.	1999 - 2000	Interested SGP metal finishers in cooperation with Shayla Barrett/CMTI and Melanie Darke/IN Dept. of Commerce	The Strategic Development Fund (SDF) was designed to assist manufacturing networks to leverage resources and address common problems. There is a possibility to obtain and utilize SDF monies to test new processes that will lessen environmental impacts. The SGP metal finishers could possibly be considered a “manufacturing network” eligible for financial support through the SDF. An in-kind match is required for these competitive grants.
7. Explore pollution prevention opportunities, capital improvements, and/or technology transfer/process changes to make progress in achieving facility-based goals.	1999 - 2000	All SGP metal finishers in cooperation with Shayla Barrett/ CMTI	
8. Refer to national data released by EPA following an industry survey to develop a national baseline to be used as a reference tool for what constitutes “best industry practices”.	Once released by EPA	Shayla Barrett/CMTI	

POTW RESPONSIBILITIES:

Action Item	Due Date	Person(s) Responsible	Note(s)
1. Pursue local ordinance revisions for sampling, recordkeeping, reporting changes for SGP metal finishers making incremental progress in achieving the performance goals.	Begin in Elkhart in 1999	Tim Goldy/Elkhart POTW, Sue Claussen/Michigan City POTW, Claudio Ternieden and Bill Blue/IDEM in cooperation with proposed Metal Finishing 5-Star Recognition Program-Debbie Dubenetzky/IDEM	
2. Recruitment of POTWs & local metal finishers & electroplaters - seek assistance of IDEM in educating local officials and metal finishers & electroplaters about benefits of SGP participation.	Continue local efforts in 1999	Tim Goldy/Elkhart and Sue Claussen/Michigan City in cooperation with Claudio Ternieden/IDEM	
3. Review proposed pretreatment streamlining rulemaking to be proposed in June '99 with a 60 day public comment period. Submit comments to EPA (optional).	Summer 1999	Interested POTWs in cooperation with Bill Blue and Claudio Ternieden/IDEM	The proposed rulemaking is expected to include monitoring oversight reductions.

IDEM RESPONSIBILITIES:

Action Item	Due Date	Person(s) Responsible	Note(s)
1. Fast-track requests for variances from classification as a solid waste in accordance with 40 CFR 260.30 and 40 CFR 260.31.	As received, anticipate three-four month turn-around time for complete requests	Gary Romesser and Dave Berrey/ RCRA	RCRA workgroup has recommended the development of a "model" variance request for use by any interested SGP metal finishers. Any companies interested in pursuing a variance request are urged to contact Gary Romesser of IDEM's RCRA Program.
2. Prepare guidance for on-site processing of hazardous waste.	To be completed by OSHWM/ RCRA in summer 1999	Gary Romesser/RCRA	
3. Pursue authorization for F006 delisting.	Expected in approximately one year (summer 2000)	Gary Romesser and Dave Berrey/RCRA	Tim Method commented that after IDEM receives RCRA delisting authorization, the state should clarify for facilities what it takes to get a hazardous waste delisted.
4. Share information on wastestream/sludge segregation - provide to CMTI	Early fall 1999	Gary Romesser/RCRA and Mark Stoddard/OPPTA with Shayla Barrett/CMTI for compilation and dissemination	
5. Provide support, education, & outreach to POTWs. Provide letter for discussion at next full stakeholder meeting tentatively scheduled in August '99.	Summer 1999	Claudio Ternieden/OWM to draft letter	POTW workgroup recommended that IDEM should prepare a letter where it clearly states its commitment to four (4) main incentives: <ul style="list-style-type: none"> - support, education and outreach to POTWs on regulatory issues; - develop a pretreatment program and rules necessary to gain full delegation from EPA Region 5; - statewide recognition (being addressed by the Recognition Workgroup); and - funding and grants for assistance in implementation at the local level.

6. Set date/location for next full stakeholder meeting in August.	Early summer	Debbie Dubenetzky/IDEM and Shayla Barrett/CMTI	
7. Determine barriers to delegation of pretreatment program to IDEM from EPA Region 5.	1999	Claudio Ternieden and Bill Blue/OWM	
8. Funding & grants to POTWs	1999	Paula Smith and Mark Stoddard/OPPTA in cooperation with Shayla Barrett/CMTI and Melanie Darke/IDoC	IDEM, CMTI, and IN Dept. of Commerce will jointly pursue diverse potential opportunities for funding.
9. Develop 5-Star Metal Finisher Environmental Recognition Program Consider inclusion of: - Good Neighbor Program - various press - fee rebates - reduction in sampling, reporting, recordkeeping (local issues)	Summer 1999	Debbie Dubenetzky & Cheri Storms	A. The first star could be awarded based on 100% compliance and SGP sign-on; and the 2 nd thru 5 th stars could be linked to the SGP performance goals. Various recognition could come as a facility achieves another “star” on the performance ladder as they incrementally achieve SGP-related goals. B. It has been suggested that 25% fee rebates might be considered for SGP metal finishers. However, Tim Method offered some caution on our ability to reduce fees. The 100% Club is looking into the issue, but we cannot dictate what POTWs have to do. C. Matt Gluckman of EPA reminded participants of the need to develop a verification process for the proposed 5-Star Program. Verification could come from a state or local level stakeholder group.

10. Develop SGP recruitment proposal including written documents	Late summer 1999	Debbie Dubenetzky, Cheri Storms/OPPTA, Claudio Ternieden and Chris Hightower/OWM in cooperation with Alice Smith/CMTI and Jerry Phillips/AESF	<p>A. Stakeholders have commented it would be useful to have a succinct written document summarizing rewards the metal finishers and POTWs will see from SGP participation - information specifying if you do this, you will get this reward in return. A state article to trade publications summarizing where we're at and what we're trying to do was also suggested.</p> <p>B. Perhaps operator certification courses could be one means of getting information out to people (e.g., consultants, etc.) regarding the availability of the Goals Program.</p> <p>C. EPA is finalizing a "How To" guidance for local SGP implementation. A draft was distributed the end of April '99. The guidance addresses the verification of performance criteria and recognition for incremental progress.</p> <p>D. POTW representative noted it may be useful to provide a copy of the baseline performance form metal finishers are asked to complete and submit soon after sign-on to the program so companies know what is expected of them by signing on to the SGP.</p>
11. Determine events for launching SGP marketing campaign.	Summer 1999	Debbie Dubenetzky, Cheri Storms/IDEM in cooperation with Alice Smith/CMTI & Jerry Phillips/AESF	<p>A. Jerry Phillips suggested that the first AESF-Indianapolis Branch meeting to be held in Sept. or Oct. '99, could serve as the publicized forum to promote the SGP.</p> <p>B. Recognition for SGP metal finishers could come from IDEM and industry publications, the IDEM web page, and possibly at the Partners for P2 Conference to be held Sept. 22 in Indianapolis.</p>

EPA REGION 5 RESPONSIBILITIES:

Action Item	Due Date	Person(s) Responsible	Note(s)
1. Expedite processing of F006 delisting requests submitted by SGP metal finishers as received	Currently takes about two (2) years to process incoming requests.	Nate Nemani, EPA Region 5	
2. Share information on sludge segregation to IDEM and CMTI.	Summer 1999	Nate Nemani, EPA Region 5	
3. Look into the issue of the lack of state reciprocity for smelters. Consider whether EPA Region 5 can assist since 5 out of 6 states in the Region have signed on to the SGP.	1999	Nate Nemani (RCRA) and Matt Gluckman (SGP Co-lead)/EPA Region 5	

IN DEPT. OF COMMERCE RESPONSIBILITIES:

Action Item	Due Date	Person(s) Responsible	Note(s)
1. Look into possibility of utilizing Indiana Development Finance Authority (IDFA) loan program for SGP metal finishers.	1999	Melanie Darke/IDoC in cooperation with Shayla Barrett/CMTI	
2. Pursue Strategic Development Fund grants for interested SGP metal finishers.	1999 - 2000	Melanie Darke/IDoC in cooperation with Shayla Barrett/CMTI	

CMTI RESPONSIBILITIES:

Action Item	Due Date	Person(s) Responsible	Note(s)
1. Provide free technical assistance and technology transfer information to metal finishers.	Available NOW	Shayla Barrett/CMTI in cooperation with Mark Stoddard/OPPTA and Doug Elliott/OPPTA-IDEM's Northern Regional Office located in South Bend	
2. Disseminate general SGP awareness information to metal finishers on CMTI's mailing lists.	Summer 1999	Shayla Barrett/CMTI in cooperation with Jerry Phillips/AESF and Debbie Dubenetzky/IDEM	
3. Consider development of state SGP newsletter.	1999	Shayla Barrett/CMTI	
4. Provide technical information to metal finishers and serve as clearinghouse for SGP-related information.	Early fall 1999	Shayla Barrett/CMTI in cooperation with Jerry Phillips/AESF, Tom Martin/Indiana Industrial Operators Association, and Sue Claussen/Indiana Water Pollution Control Association.	
5. Provide information to metal finishers regarding options for wastestream/sludge segregation to reduce the volume of sludges ultimately regulated as hazardous waste and/or F006.	1999	Shayla Barrett/CMTI in cooperation with Kevin Frecker/Baycote Metal Finishing, Gary Romesser/IDEM, and Nate Nemani/EPA Reg. 5	
6. Develop SGP and compliance/technical assistance brochure to be left with metal finishers at the time of inspection by IDEM.	1999	Shayla Barrett/CMTI in cooperation with Jerry Phillips/AESF and Debbie Dubenetzky/IDEM	Brochures could refer facilities to CMTI, OPPTA, and others for assistance.
7. Develop proposal for SGP metal finisher assessments/audits to benchmark individual metal finisher's status for: - energy usage, emissions, and wastes - capital improvement opportunities - compliance status	1999	Shayla Barrett/CMTI in cooperation with Mark Stoddard and Doug Elliott/OPPTA-IDEM	Consider IDEM's <i>Self-disclosure and Environmental Audit Policy</i> as published in 5/1/99 <u>Indiana Register</u> (Attachment C).